

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

<p><b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b></p>	<p><b>Master File No. 2:12-MD-02327 MDL No. 2327</b></p>
<p><b>THIS DOCUMENT RELATES TO:</b></p> <p><i>Wave 12 cases listed on Plaintiffs' Exhibit A</i></p>	<p><b>Wave 12</b></p> <p><b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b></p>

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSES  
REGARDING DENISE ELSER, M.D. FOR WAVE 12**

Plaintiffs filed a Notice of Adoption [Dkt. 8709] in the Wave 12 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Denise Elser, M.D. and Supporting Memorandum from Ethicon Wave 1, Dkt. 2053 (motion), 2056 (memorandum in support); Dkt 2228 (reply; and the reply brief filed in Wave 3 (Dkt. 3052). Defendants hereby adopt and incorporate by reference the *Daubert* responses filed in relation to Denise Elser, M.D. for Ethicon Wave 1, Dkt. 2149; Wave 2, Dkt. 2513; and, Wave 3, Dkt. 2932. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 1, 2, and 3 response briefing.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage

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